

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROCHE FREEDMAN LLP,

Plaintiff,

v.

JASON CYRULNIK,

Defendant.

Case No. 1:21-cv-01746 (JGK)(SN)

JASON CYRULNIK,

Counterclaim-Plaintiff,

v.

ROCHE FREEDMAN LLP, KYLE ROCHE,
DEVIN FREEDMAN, AMOS FRIEDLAND,
NATHAN HOLCOMB, and EDWARD
NORMAND,

Counterclaim-Defendants.

JASON CYRULNIK,

Third-Party Plaintiff,

v.

KYLE ROCHE, DEVIN FREEDMAN,
AMOS FRIEDLAND, NATHAN HOLCOMB,
and EDWARD NORMAND,

Third-Party Defendants.

**DECLARATION OF TIMOTHY S. MARTIN IN SUPPORT OF NOTICE OF
WITHDRAWAL OF APPEARANCE**

I, Timothy S. Martin, declare and state as follows:

1. On June 3, 2022, I filed a Notice of Appearance on behalf of Plaintiff Roche
Freedman LLP and Counterclaim-Defendants and Third-Party Defendants Devin

Freedman, Amos Friedland, Nathan Holcomb, Edward Normand, and Kyle Roche (ECF. No. 127).

2. On September 13, 2022, I filed a Motion to Withdraw as Attorney for Counterclaim-Defendant and Third-Party Defendant Kyle Roche (ECF No. 239).
3. On November 8, 2022, the Court approved the substitution of Jonathan P. Bach of Shapiro Arato Bach in place and stead of Kaplan Hecker & Fink LLP as counsel for Plaintiff and Counterclaim-Defendant Roche Freedman LLP and Counterclaim-Defendants and Third-Party Defendants Devin Freedman, Amos Friedland, and Edward Normand (ECF. No. 275).
4. Pursuant to Local Civil Rule 1.4, I respectfully request that the Court withdraw my individual appearance as counsel for Counterclaim-Defendant and Third-Party Defendant Nathan Holcomb.
5. This withdrawal is made with the consent of Nathan Holcomb, an attorney admitted to practice in this court.
6. This withdrawal will not affect this action in any way, including the posture of the case and the calendar; nor will it prejudice Defendant and Counterclaim-Plaintiff and Third-Party Plaintiff. I am not asserting a retaining or charging lien.

Dated: November 17, 2022
New York, New York

Respectfully submitted,

/s/ Timothy S. Martin

Timothy S. Martin

KAPLAN HECKER & FINK LLP

350 Fifth Avenue, 63rd Floor

New York, New York 10118

Telephone: (212) 763-0883

Facsimile: (212) 564-0883

tmartin@kaplanhecker.com

Counsel for Plaintiff